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*Electronically Filed on
December 20, 2007*

11 Attorneys for
12 ENRICO MORELLI and PAUL MORELLI

13 **UNITED STATES BANKRUPTCY COURT**

14 **DISTRICT OF NEVADA**

15 In re
16 CHARLOTTE E. MORELLI,
17 Debtor.

18 Case No. BK-N-06-50272-GWZ
19 Chapter 7 (Converted from 13)

20 ENRICO MORELLI and PAUL MORELLI,
21 Plaintiffs,

22 Adversary No. 06-5099

23 vs.
24 CHARLOTTE MORELLI, individually and as
25 trustee of the Pia Family Trust, Pia Family
26 Trust A, Pia Family Trust B, Pia Family Trust
27 dated November 16, 1995, JA Trust, CM Trust,
28 Becaris Trust, Bay Cities Properties Trust, and
COFFEE PLAZA TRUST; PIA FAMILY TRUST; PIA
FAMILY TRUST A; PIA FAMILY TRUST B;
PIA FAMILY TRUST DATED NOVEMBER
16, 1995; JA TRUST; CM TRUST; BECARIS
TRUST; BAY CITIES PROPERTIES TRUST;
COFFEE PLAZA TRUST; BAY CITIES
PROPERTIES, INC.; and COFFEE PLAZA,

**NOTICE OF PARTIAL RELEASE OF
ATTORNEYS' LIEN OF JONES
VARGAS**

Hearing Date: n/a
Hearing Time: n/a

1 PLEASE TAKE NOTICE that Jones Vargas, by and through Janet L. Chubb and Louis M.
2 Bubala III, filed an attorneys' lien on April 4, 2007, against any claim, demand or cause of action,
3 in favor of Enrico Morelli and/or Paul Morelli, and to any money or property which is recovered in
4 this action. NRS 18.015.

5 PLEASE TAKE FURTHER NOTICE that Jones Vargas releases its lien against the
6 \$200,00.00 sum being paid to Enrico Morelli and Paul Morelli pursuant to the Trustee's Motion for
7 Authority to Make Interim Distribution filed on November 29, 2007. Otherwise this lien
8 continues to attach to any verdict, judgment or decree entered and to any money or property which
9 is recovered on account of the suit or other action, from the time of service of the notices required
10 by NRS 18.015.

11 DATED this 20th day of December, 2007.

12 JONES VARGAS

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14 By: //s//Janet L. Chubb
15 JANET L. CHUBB
16 LOUIS M. BUBALA III
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CERTIFICATE OF SERVICE

1. On December 20, 2007, I served the following document(s):

NOTICE OF PARTIAL RELEASE OF ATTORNEYS' LIEN OF JONES VARGAS

2. I served the above-named document(s) by the following means to the persons as listed below:

- a. **ECF System** (attach the "Notice of Electronic Filing" or list all persons and addresses):

- JEREMY T BERGSTROM mbergstrom@mileslegal.com
- DANIEL S CORDER idontlikemondays@msn.com
- FRED E. GREEN FRED.E.GREEN@IRSCOUNSEL.TREAS.GOV
- RICHARD G. HILL greccelle@richardhillaw.com, cdetlie@richardhillaw.com
- MICHAEL LEHNERS mikelehners@yahoo.com
- ANABELLE SAVAGE angiesavage@sbcglobal.net, nv06@ecfcbis.com
- U.S. TRUSTEE - RN - 7 USTPRegion17.RE.ECF@usdoj.gov
- JOAN C WRIGHT jwright@allisonmackenzie.com, jbrooks@allisonmackenzie.com

9 b. United States mail, postage fully prepaid (list persons and addresses):

9 c. Personal Service (list persons and addresses):

I personally delivered the document(s) to the persons at these addresses:

For a party represented by an attorney, delivery was made by handing the document(s) to the attorney or by leaving the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

9 d. **By direct email (as opposed to through the ECF System) (list persons and email addresses):**

Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

9 e. By fax transmission (list persons and fax numbers):

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the

1 fax numbers listed below. No error was reported by the fax machine that I
2 used. A copy of the record of the fax transmission is attached.
3

4 **9 f. By messenger:**
5

I served the document(s) by placing them in an envelope or package
4 addressed to the persons at the addresses listed below and providing them to
5 a messenger for service. (A declaration by the messenger must be attached
to this Certificate of Service).

6 **I declare under penalty of perjury that the foregoing is true and correct.**

7 DATED this 20th day of December, 2007.

8 T. Waldo
9 Name

//s// Tawney Waldo
Signature

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